

City of Cedartown Transit



Title VI Plan

Date Adopted: September/09/2019



Table of Contents

1.0 Title VI/Nondiscrimination Policy Statement and Management Commitment to Title VI Plan	1-1
2.0 Introduction & Description of Services	2-1
2.1 First Time Applicant Requirements	2-2
2.2 Annual Certifications and Assurances	2-2
2.3 Title VI Plan Concurrence and Adoption	2-3
3.0 Title VI Notice to the Public	3-1
3.1 Notice to Public	3-1
3.2 Notice Posting Locations	3-1
4.0 Title VI Procedures and Compliance	4-2
4.1 Complaint Procedure	4-2
4.2 Complaint Form	4-2
4.3 Record Retention and Reporting Policy	4-3
4.4 Sub-recipient Assistance and Monitoring	4-3
4.5 Sub recipients and Subcontractors	4-4
5.0 Title VI Investigations, Complaints, and Lawsuits	5-1
6.0 Public Participation Plan	6-1
7.0 Language Assistance Plan	7-2
8.0 Transit Planning and Advisory Bodies	8-3
9.0 Title VI Equity Analysis	9-4
10.0 System-Wide Service Standards and Service Policies	10-5
11.0 Appendices	11-6
APPENDIX A	FTA CIRCULAR 4702.1B REPORTING REQUIREMENTS FOR TRANSIT PROVIDERS
APPENDIX B	CURRENT SYSTEM DESCRIPTION
APPENDIX C	TITLE VI PLAN ADOPTION MEETING MINUTES AND GDOT CONCURRENCE LETTER
APPENDIX D	TITLE VI SAMPLE NOTICE TO PUBLIC
APPENDIX E	TITLE VI COMPLAINT FORM
APPENDIX F	PUBLIC PARTICIPATION PLAN
APPENDIX G	LANGUAGE ASSISTANCE PLAN
APPENDIX H	OPERATING AREA LANGUAGE DATA: CITY OF CEDARTOWN TRANSIT SERVICE AREA
APPENDIX I	DEMOGRAPHIC MAPS
APPENDIX J	TITLE VI EQUITY ANALYSIS
APPENDIX K	TEXT FORMATTING PALETTE

2.1 First Time Applicant Requirements

FTA Circular 4702.1B, Chapter III, Paragraph 3: Entities applying for FTA funding for the first time shall provide information regarding their Title VI compliance history if they have previously received funding from another Federal agency.

City of Cedartown Transit is not a first time applicant for FTA/GDOT funding. The following is a summary of Cedartown Transit's current and pending federal and state funding.

Current and Pending FTA Funding

Current and Pending GDOT Funding

1. GDOT, 7/1/2018 to 6/30/2019 - \$34,000 - CURRENT

Current and Pending Federal Funding (non-FTA)

1. TRANSIT ALLIANCE, 7/1/2018 to 6/30/2019 - \$20,348.90 - CURRENT

Current and Pending State Funding (non-GDOT)

During the previous three years, GDOT did not complete a Title VI compliance review of City of Cedartown Transit. City of Cedartown Transit has not been found to be in noncompliance with any civil rights requirements. GDOT has completed a Title VI "Risk Analysis" review of the City of Cedartown's Title VI program in the last three years.

2.2 Annual Certifications and Assurances

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances. Primary recipients will collect Title VI assurances from sub-recipients prior to passing through FTA funds.

City of Cedartown Transit will remain in compliance with this requirement by annual submission of certifications and assurances as required by GDOT.

2.3 Title VI Plan Concurrence and Adoption

This Title VI Plan received GDOT concurrence on June 27th, 2019. The Plan was approved and adopted by the City of Cedartown City Commission during a meeting held on September 9th, 2019. A copy of the meeting minutes and GDOT concurrence letter is included in Appendix C of this Plan.

FTA Circular 4702.1B, Chapter III, Paragraph 2: Every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with the Title VI regulations.

3.0 Title VI Notice to the Public

FTA Circular 4702.1B, Chapter III, Paragraph 5: Title 49 CFR 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI.

3.1 Notice to Public

Recipients must notify the public of its rights under Title VI and include the notice and where it is posted in the Title VI Plan. The notice must include:

- A statement that the agency operates programs without regard to race, color and national origin
- A description of the procedures members of the public should follow in order to request additional information on the grantee's nondiscrimination obligations
- A description of the procedure members of the public should follow in order to file a discrimination complaint against the grantee

A sample of the notice is included in Appendix D of this Plan. The sample notice should be translated into other languages, as necessary.

3.2 Notice Posting Locations

The Notice to Public will be posted at many locations to apprise the public of CITY OF CEDARTOWN TRANSIT'S obligations under Title VI and to inform them of the protections afforded them under Title VI. At a minimum, the notice will be posted in public areas of CITY HALL including the reception desk and meeting rooms, and on the CITY OF CEDARTOWN website at cedartowngeorgia.gov. Additionally, CITY OF CEDARTOWN TRANSIT will post the notice at stations, stops and on transit vehicles.

4.0 Title VI Procedures and Compliance

FTA Circular 4702.1B, Chapter III, Paragraph 6: All recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to member of the public.

4.1 Complaint Procedure

Any person who believes he or she has been discriminated against on the basis of race, color or national origin by City of Cedartown Transit may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form (refer to Appendix E). City of Cedartown Transit investigates complaints received no more than 180 days after the alleged incident. City of Cedartown Transit will process complaints that are complete.

Once the complaint is received, City of Cedartown Transit will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing him/her whether the complaint will be investigated by our office.

City of Cedartown Transit has ninety (90) days to investigate the complaint. If more information is needed to resolve the case, City of Cedartown Transit may contact the complainant. The complainant has ten (10) business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within ten (10) business days, City of Cedartown Transit can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. A LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. If the complainant wishes to appeal the decision, she/he has seven (7) days to do so from the time he/she receives the closure letter or the LOF.

The complaint procedure will be made available to the public on www.cedartowngeorgia.gov

4.2 Complaint Form

A copy of the complaint form in English and Spanish is provided in Appendix E and on www.cedartowngeorgia.gov

4.3 Record Retention and Reporting Policy

FTA requires that all direct and primary recipients (GDOT) document their compliance by submitting a Title VI Plan to their FTA regional civil rights officer once every three (3) years. City of Cedartown Transit will submit Title VI Plans to GDOT for concurrence on an annual basis or any time a major change in the Plan occurs.

FTA Circular 4702.1B, Chapter III, Paragraph 11: Primary recipients should assist their sub-recipients in complying with DOT's Title VI regulations, including the general reporting requirements.

Compliance records and all Title VI related documents will be retained for a minimum of three (3) years and reported to the primary recipient annually.

4.4 Sub-recipient Assistance and Monitoring

City of Cedartown Transit System does not have any sub-recipients to provide monitoring and assistance to. As a sub-recipient to GDOT, City of Cedartown Transit utilizes the sub-recipient assistance and monitoring provided by GDOT, as needed. In the future, if City of Cedartown Transit has sub-recipients, it will provide assistance and monitoring as required by FTA Circular 4702.1B.]

4.5 Sub recipients and Subcontractors

City of Cedartown Transit is responsible for ensuring that subcontractors (TPOs) are in compliance with Title VI requirements. Sub recipients may not discriminate in the selection and retention of any subcontractors. Subcontractors also may not discriminate in the selection and retention of any subcontractors. City of Cedartown Transit, subcontractors, and/or TPOs may not discriminate in their employment practices in connection with federally assisted projects. Subcontractors and TPOs are not required to prepare or submit a Title VI Plan. However, the following nondiscrimination clauses will be inserted into every contract with contractors and subcontractors subject to Title VI regulations.

Nondiscrimination Clauses

During the performance of a contract, the contractor, for itself, its assignees and successors in interest (hereinafter referred to as the "Contractor") must agree to the following clauses:

1. **Compliance with Regulations:** The Contractor shall comply with the Regulations relative to nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation (hereinafter, "USDOT") Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this Agreement.
2. **Nondiscrimination:** The Contractor, with regard to the work performed during the contract, shall not discriminate on the basis of race, color, national origin, sex, age, disability, religion or family status in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The Contractor shall not participate either directly or indirectly in the discrimination prohibited by section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.
3. **Solicitations for Subcontractors, including Procurements of Materials and Equipment:** In all solicitations made by the Contractor, either by competitive bidding or negotiation for work to be performed under a subcontract, including procurements of materials or leases of equipment; each potential subcontractor or supplier shall be notified by the Contractor of the subcontractor's obligations under this contract and the Regulations relative to nondiscrimination on the basis of race, color, national origin, sex, age, disability, religion or family status.
4. **Information and Reports:** The Contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the *Georgia Department of Transportation and/or the Federal Transit Administration*, to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a Contractor is in the exclusive possession of another who fails or refuses to furnish this information the Contractor shall so certify to the *Georgia Department of Transportation*, and/or the *Federal Transit Administration*, as appropriate, and shall set forth what efforts it has made to obtain the information.
5. **Sanctions for Noncompliance:** In the event of the Contractor's noncompliance with the nondiscrimination provisions of this contract, City of Cedartown Transit shall impose contract sanctions as appropriate, including, but not limited to:

- a. withholding of payments to the Contractor under the contract until the Contractor complies, and/or
 - b. cancellation, termination or suspension of the contract, in whole or in part.
- 6. **Incorporation of Provisions:** The Contractor shall include the provisions of paragraphs (1) through (6) in every subcontract, including procurement of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The Contractor shall take such action with respect to any subcontract or procurement as the City of Cedartown Transit, Georgia Department of Transportation, and/or the Federal Transit Administration, may direct as a means of enforcing such provisions including sanctions for noncompliance.

Disadvantaged Business Enterprise (DBE) Policy

As a condition of your agreement with GDOT, City of Cedartown Transit and its contractors and subcontractors agree to ensure that Disadvantaged Business Enterprises as defined in 49 CFR Part 26, as amended, have the opportunity to participate in the performance of contracts. City of Cedartown Transit and its contractor and subcontractors shall not discriminate on the basis of race, color, national origin, or sex in the performance of any contract. The contractor shall carry out applicable requirements of 49 CFR Part 26 in the award and administration of GDOT-assisted contracts. Failure by the contractor to carry out these requirements is a material breach of this contract, which may result in the termination of the contract or such other remedy as the recipient deems appropriate.

E-Verify

As a condition of your agreement with GDOT, vendors and contractors of City of Cedartown Transit shall utilize the U.S. Department of Homeland Security's E-Verify system to verify the employment eligibility of all new employees hired by the vendor or contractor while contracted with City of Cedartown Transit. Additionally, vendors and contractors shall expressly require any subcontractors performing work or providing services pursuant to work for City of Cedartown Transit shall likewise utilize the U.S. Department of Homeland Security's E-Verify system to verify the employment eligibility of all new employees hired by the subcontractor while working for City of Cedartown Transit.

5.0 Title VI Investigations, Complaints, and Lawsuits

FTA Circular 4702.1B, Chapter III, Paragraph 7: In order to comply with the reporting requirements of 49 CFR 21.9(b), FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations....; lawsuits, and complaints naming the recipient.

In accordance with 49 CFR 21.9(b), CITY OF CEDARTOWN TRANSIT must record and report any investigations, complaints, or lawsuits involving allegations of discrimination. The records of these events shall include the date the investigation, lawsuit, or complaint was filed; a summary of the allegations; the status of the investigation, lawsuit, or complaint; and actions taken by CITY OF CEDARTOWN TRANSIT in response; and final findings related to the investigation, lawsuit, or complaint. The records for the previous three (3) years shall be included in the Title VI Plan when it is submitted to GDOT.

CITY OF CEDARTOWN TRANSIT has had NO investigations, complaints, or lawsuits involving allegations of discrimination on the basis of race, color, or national origin over the past three (3) years. A summary of these incidents is recorded in Table 1.

Table 1: Summary of Investigations, Lawsuits, and Complaints

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations	n/a	n/a	n/a	n/a
1.				
2.				
Lawsuits	n/a	n/a	n/a	n/a
1.				
2.				
Complaints	n/a	n/a	n/a	n/a
1.				
2.				

6.0 Public Participation Plan

FTA Circular 4702.1B, Chapter III, Paragraph 4.a.4: Every Title VI Plan shall include the following information: A public participation plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Plan submission. A recipient's targeted public participation plan of minority populations may be part of efforts that extend more broadly to include constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others.

The Public Participation Plan (PPP) for Cedartown Transit was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the decision-making process for Cedartown Transit. The PPP is included as Appendix F to this Title VI Plan.

Current Outreach Efforts

Cedartown Transit is required to submit a summary of public outreach efforts made over the last three (3) years. The following is a list and short description of Cedartown Transit's recent, current, and planned outreach activities.

- Through coordination with the Public Information Officer of the City of Cedartown, Cedartown Transit has publicized the availability of City transit through the City's website and social media accounts. An example of one such public outreach was an article that was titled "Do you know about our City transit bus?" Within that article was an explanation of the transit program and what who and where the system serves.
- As a part of larger efforts to educate the public on where public funds go, the City Transit department and Public Information Office released an article highlighting the efforts of the City's transit drivers and what the transit program does for the community.
- To further assist minority/LEP populations with the transit system's services, as the Public Information Office publicizes future material on the availability of City transit, efforts will be made to include Spanish translated outreach articles in conjunction with normal publicity efforts. The efforts of the transit program will be publicized in Spanish in future articles and press releases.
- Low-income populations may not necessarily have the same accessibility to online resources. Transit informational materials will be made available at City Hall and the Cedartown Library. There is a social services center in Cedartown called One Door Polk. Transit informational materials will be made available at this central social services hub as well.

7.0 Language Assistance Plan

FTA Circular 4702.1B, Chapter III, Paragraph 9: Recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited English proficient (LEP).

Cedartown Transit operates a transit system within the city limits of Cedartown, Georgia. The Language Assistance Plan (LAP) has been prepared to address the City of Cedartown Transit's responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP. In the Cedartown Transit service area there are 1,967 residents or 22.1% who describe themselves as not able to communicate in English very well (Source: US Census). Cedartown Transit is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. Cedartown Transit has utilized the U.S. Department of Transportation (DOT) LEP Guidance Handbook and performed a four factor analysis to develop its LAP. The LAP is included in this Title VI Plan as Appendix G.

8.0 Transit Planning and Advisory Bodies

FTA Circular 4702.1B, Chapter III, Paragraph 10: Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

City of Cedartown Transit does not have a transit-related committee or board, therefore this requirement does not apply.

9.0 Title VI Equity Analysis

FTA Circular 4702.1B, Chapter III, Paragraph 4.a.8: If the recipient has constructed a facility, such as vehicle storage, maintenance facility, operation center, etc., the recipient shall include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility.

Title 49 CFR, Appendix C, Section (3)(iv) requires that “the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.” For purposes of this requirement, “facilities” does not include bus shelters, as they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. In order to comply with the regulations, City of Cedartown Transit will ensure the following:

1. City of Cedartown Transit will complete a Title VI equity analysis for any facility during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. City of Cedartown Transit will engage in outreach to persons potentially impacted by the siting of the facility. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.
2. When evaluating locations of facilities, City of Cedartown transit will give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group level where appropriate to ensure that proper perspective is given to localized impacts.
3. If City of Cedartown Transit determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, City of Cedartown Transit may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. City of Cedartown Transit must demonstrate and document how both tests are met. City of Cedartown Transit will consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

Your Transit System has not recently constructed any facilities nor does it currently have any facilities in the planning stage. Therefore, Your Transit System does not have any Title VI Equity Analysis reports to submit with this Plan.

10.0 System-Wide Service Standards and Service Policies

FTA Circular 4702.1B, Chapter III, Paragraph 10: All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide.

City of Cedartown is not a fixed route service provider.

11.0 Appendices

APPENDIX A	FTA CIRCULAR 4702.1B REPORTING REQUIREMENTS FOR TRANSIT PROVIDERS
APPENDIX B	CURRENT SYSTEM DESCRIPTION
APPENDIX C	TITLE VI PLAN ADOPTION MEETING MINUTES AND GDOT CONCURRENCE LETTER
APPENDIX D	TITLE VI SAMPLE NOTICE TO PUBLIC
APPENDIX E	TITLE VI COMPLAINT FORM
APPENDIX F	PUBLIC PARTICIPATION PLAN
APPENDIX G	LANGUAGE ASSISTANCE PLAN
APPENDIX H	OPERATING AREA LANGUAGE DATA: CITY OF CEDARTOWN TRANSIT SERVICE AREA
APPENDIX I	DEMOGRAPHIC MAPS
APPENDIX J	TITLE VI EQUITY ANALYSIS
APPENDIX K	TEXT FORMATTING PALETTE

Appendix A

FTA Circular 4702.1B Reporting Requirements for Transit Providers

Every three years, on a date determined by FTA, each recipient is required to submit the following information to the Federal Transit Administration (FTA) as part of their Title VI Program. Sub-recipients shall submit the information below to their primary recipient (the entity from whom the sub-recipient receives funds directly), on a schedule to be determined by the primary recipient.

General Requirements

All recipients must submit:

- ☐ Title VI Notice to the Public, including a list of locations where the notice is posted
- ☐ Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)
- ☐ Title VI Complaint Form
- ☐ List of transit-related Title VI investigations, complaints, and lawsuits
- ☐ Public Participation Plan, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission
- ☐ Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance
- ☐ A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees
- ☐ Primary recipients shall include a description of how the agency monitors its sub-recipients for compliance with Title VI, and a schedule of sub-recipient Title VI Program submissions
- ☐ **A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.**
- ☐ A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program. For State DOTs, the appropriate governing entity is the State's Secretary of Transportation or equivalent. The approval must occur prior to submission to FTA.
- ☐ Additional information as specified in Chapters IV, V, and VI, depending on whether the recipient is a transit provider, a State, or a planning entity (see below)

Requirements of Transit Providers

All Fixed Route Transit Providers must submit:

- ☐ All requirements set out in Chapter III (General Requirements)
- ☐ Service standards
 - Vehicle load for each mode
 - Vehicle headway for each mode
 - On time performance for each mode
 - Service availability for each mode
- ☐ Service policies
 - Transit Amenities for each mode
 - Vehicle Assignment for each mode

Transit Providers that operate 50 or more fixed route vehicles in peak service and are located in an Urbanized Area (UZA) of 200,000 or more people must submit:

- ☐ Demographic and service profile maps and charts
- ☐ Demographic ridership and travel patterns, collected by surveys
- ☐ Results of their monitoring program and report, including evidence that the board or other governing entity or official(s) considered, was aware of the results, and approved the analysis
- ☐ A description of the public engagement process for setting the “major service change policy,” disparate impact policy, and disproportionate burden policy
- ☐ Results of service and/or fare equity analyses conducted since the last Title VI Program submission, including evidence that the board or other governing entity or official(s) considered, was aware of, and approved the results of the analysis

Appendix B

Current System Description

Current System Description

1. An overview of the organization including its mission, program goals and objectives.

City of Cedartown Transit's current and long-term focus as a transportation provider is on maintaining the best-coordinated transportation system possible for this community. Our goal is to create a coordinated system with the objective of providing safe, reliable, timely and efficient transportation services to county residents.

2. Organizational structure, type of operation, number of employees, service hours, staffing plan and safety and security plan.

City of Cedartown Transit is a part of the City of Cedartown governmental organization. Our City organization is made up of 109 full-time employees and 7 part-time employees. Our public works director/transit director is responsible for all of the day-to-day operations of our organization and reports directly to our City Manager and Board of City Commissioners. Our City Commission is committed to this program and has, therefore, incorporated our service within the City's Public Transportation Program. We will continue to operate at previous year (2017) service hours averaging 6.60 total fleet service hours per day or approximately 1,637 annual service hours (assuming 248 operating days).

3. Indicate if your agency is a government authority.

City of Cedartown Transit is a part of the City of Cedartown governmental organization.

4. Who is responsible for insurance, training and management, and administration of the agency's transportation programs?

The transit director/public works director is responsible for training and management of our transportation program. All safety sensitive employees are required to complete GDOT approved safety and security training course as part of their new hire orientation. All new employees are also required to complete 80 hours of on-the-road drivers training, which includes riding with a training driver, behind-the-wheel training, and training on proper use of wheel chair lifts and securement devices. The transit director, in coordination with the finance officer, responsible for annual renewal of all liability insurance for both GDOT and agency owned vehicles, as well as vehicle registration renewal. It is the transit director's responsibility to administer all aspects of the transportation program and to control access and usage of all agency vehicles.

5. Who provides vehicle maintenance and record keeping?

Maintenance on transit vehicles is provided by private companies that utilize ASE certified technicians with experience in working on commercial passenger vehicles like the type our agency uses. All maintenance is performed using the Preventative Maintenance Plan, which conforms to the State Vehicle Maintenance Guidelines set forth in the GDOT Preventative Maintenance Guidelines document. All vehicle files and driver files are kept on-site at our operations base located at [address] and are maintained by the transit director. All records are maintained and retained for a minimum of four (4) years or guidelines set by the State of Georgia's Records Retention Policy (whichever is greater).

6. Number of current transportation related employees

Our transportation department has a total of 4 employees that include: 2 part-time drivers, 1 administrators and 1 support staff. Occasionally, staff trained in transit operations from the public works department will assist.

7. Who will drive the vehicle, number of drivers, CDL certifications, etc.?

Only transportation employees that have completed all of the required safety and drivers training requirements will be allowed to drive the agency vehicles. All our drivers are required to carry a Commercial Driver's License. This allows coverage of all of the larger vehicles and for the opportunity for the other drivers to fill in on service routes with the larger vehicles.

8. A detailed description of service routes and ridership numbers

Transportation services provided through our program are available to 9,750 residents. Our service incorporates the transportation of city residents to any location within the city limits of Cedartown. We provide a wide range of trip purposes that include: medical, nutrition, shopping, social service, training, employment, social and recreation. Currently, we use a single vehicle (with backup available) to provide passenger services. Our fleet is a modified passenger van. Our vehicles are equipped for wheelchair service. We prioritize grouping trips and multi-loading to the maximum extent possible. We make 23 passenger trips per day on average and leverage our fleet resources so that all vehicles are used in a responsible manner to provide full coverage and retire the vehicles at a consistent pace and appropriate age and mileage.

Appendix C

Title VI Plan Adoption Meeting Minutes and GDOT Concurrence Letter

Insert a copy of the Title VI Plan adoption meeting minutes and the GDOT concurrence letter.



Russell R. McMurtry, P.E., Commissioner
One Georgia Center
600 West Peachtree NW
Atlanta, GA 30308
(404) 631-1990 Main Office

Via E-mail transmission

June 20, 2019

City of Cedartown
Carol Crawford, City Clerk
P.O. Box 65
Cedartown, GA 30125

Dear Ms. Crawford,

The Department has completed its review of your Title VI Plan and has determined that it meets the requirements established in the Federal Transit Administration's (FTA) Circular 4702.1B, "Title VI Program Guidelines for Federal Transit Administration Recipients," effective October 1, 2012. Please insert the demographic maps into your final Title VI Version and once adopted, please send Ms. Nystrom the final Title VI Plan.

Thank you for your ongoing cooperation and compliance of the FTA Civil Rights Program requirements. Should you need assistance or have any questions, please do not hesitate to contact Ms. Michele Nystrom, Transit Compliance and Asset Manager directly at (404) 631-1235 or at mnystrom@dot.ga.gov

Sincerely,

A handwritten signature in blue ink, appearing to read "LA 2", is written over a faint, larger signature.

Leigh Ann Trainer, Transit Program Manager
Division of Intermodal

cc: Michele Nystrom, Transit Compliance and Asset Manager
Freida Black, Assistant Program Delivery Manager, District Six

Appendix D

Title VI Sample Notice to Public

Cedartown Transit
Title VI Policy

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that “no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance”.

Cedartown Transit is committed to ensuring that no person is excluded from participation in, or denied, the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.A.

If you feel you are being denied participation in or being denied benefits of the transit services provided by the City of Cedartown, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, please contact the Cedartown Transit Title VI Coordinator using the following contact information.

Cedartown Transit Title VI Coordinator
201 East Avenue
Cedartown, Georgia 30125
(770) 748-3220

If you believe that you have been excluded from participation in, been denied the benefits of, or been subjected to discrimination under the Cedartown Transit service you may file an official Title VI complaint with the Cedartown Transit Title VI Coordinator. We encourage you to make your complaint in writing. The Title VI Complaint Procedures and Complaint Form can be obtained by calling the number above or by downloading the form from our website: www.cedartowngeorgia.gov

You may also file your complaint directly with the FTA at: Federal Transit Administration Office of Civil Rights Attention: Title VI Program Coordinator, East Building, 5th Floor - TCR 1200 New Jersey Avenue, SE, Washington, DC 20590

Cedartown Transit
Politica del Título VI

Politica No-Discriminacion de Cedartown Transito para las personas protegidas bajo del Título VI prohíbe la discriminacion en programas y actividades que reciben asistencia financiera Federal. Específicamente, el Título VI establece que "ninguna persona en los Estados Unidos será excluida de participar en, ser negado los beneficios de, o ser sujeto a discriminación bajo cualquier programa o actividad que reciba asistencia financiera Federal."

Cedartown Tránsito se compromete a garantizar que ninguna persona sea excluida de participar en, o negado, los beneficios de sus servicios de transporte en la base de la Politica No-Discriminacion de Título VI, tal como está protegida por el Título VI de la Administración Federal de Tránsito (FTA) 4702.1.A Circular.

Coordinador Cedartown Tránsito Título VI
201 East Avenue
Cedartown, Georgia 30125
(770) 748-3220

Si usted cree que ha sido excluida de participar en, ha negado los beneficios de, o ha sido objeto de discriminación en el marco del servicio de Tránsito Cedartown usted puede presentar una queja oficial de Título VI con el Coordinador Cedartown Tránsito Título VI. Le animamos para que se queja por escrito. El Procedimiento de Quejas y Quejas Formulario Título VI se puede obtener llamando al número anterior o mediante la descarga de nuestro sitio: www.cedartowngeorgia.gov

Usted tambien puede presentar su queja directamente a FTA: Oficina de la Administracion Federal de Transporte (Federal Transit Administration Office), Title VI Coordinator, East Building, 5th Floor - TCR 1200 New Jersey Avenue, SE, Washington, DC 20590

Appendix E

Title VI Complaint Form

Cedartown Transit Title VI Complaint Form

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

The Environmental Justice component of Title VI guarantees fair treatment for all people and provides for the Cedartown Transit to identify and address, as appropriate, disproportionately high and adverse effects of its programs, policies, and activities on minority and low-income populations, such as undertaking reasonable steps to ensure that Limited English Proficient (LEP) persons have meaningful access to the programs, services, and information that Cedartown Transit provides.

Cedartown Transit works to ensure nondiscriminatory transportation in support of our mission to provide effective, coordinated and integrated multimodal transportation solutions to enhance the social and economic quality of life for all Cedartown citizens. Cedartown Transit's Title VI Coordinator is responsible for the Civil Rights Compliance and Monitoring to ensure non-discriminatory provision of transit services and programs.

Complainant Name _____

Mailing Address _____

Telephone Numbers _____
(Home) (Work)

Email Address _____

List type of discrimination (please check all that apply):

Race () Color () National Origin ()

Other _____

Please indicate your race/color, if it is a basis of your complaint _____

Please describe your national origin, if it is a basis of your complaint _____

Location where incident occurred _____

Time and date of incident _____

Name/Position of the person who allegedly subjected you to Title VI discrimination:

Briefly describe the incident (use a separate sheet, if necessary):

Did anyone else witness the incident? Yes () No ()

List witnesses (Use a separate sheet, if necessary)

Name _____

Address _____

Telephone Number _____

Name _____

Address _____

Telephone Number _____

Have you filed a complaint about the alleged discrimination with the Federal Transit Administration?

Yes () No () If yes, when? _____

Complainant Signature

Date

The complaint shall be sent to the following address:

Cedartown Transit
Title VI Coordinator
201 East Avenue
Cedartown, Georgia 30125

Cedartown Tránsito

Formulario de Queja del Título VI

Título VI del Acta de Derechos Civiles de 1964 prohíbe la discriminación en programas y actividades que reciben asistencia financiera Federal. Específicamente, el Título VI establece que "ninguna persona en los Estados Unidos será excluida de participar en, ser negado los beneficios de, o ser sujeto a discriminación bajo cualquier programa o actividad que reciba asistencia financiera Federal."

El componente de Justicia Ambiental del Título VI garantiza un trato justo para todas las personas y prevé Cedartown Tránsito para identificar y abordar, en su caso, desproporcionadamente altos y efectos adversos de sus programas, políticas y actividades en las poblaciones minoritarias y de bajos ingresos, como la empresa las medidas razonables para garantizar que personas con Dominio Limitado del Inglés (LEP) tienen un acceso significativo a los programas, servicios, y la información que proporciona Cedartown Tránsito.

Cedartown Tránsito trabaja para asegurar el transporte no discriminatorio en apoyo de nuestra misión de proporcionar soluciones de transporte multimodal eficaces, coordinados, y integrados para mejorar la calidad social y económica de la vida para todos los ciudadanos de Cedartown. El Coordinador del Título VI de Cedartown Tránsito es responsable del cumplimiento de los Derechos Civiles y Seguimiento para garantizar la prestación no-discriminatoria de servicios y programas de tránsito.

Nombre Demandante _____

Dirección de Correo _____

Teléfonos _____
(Hogar) (Trabajo)

Dirección de Correo Electrónico _____

Anote el tipo de discriminación

Lugar donde se produjo incidente _____

Hora y fecha del incidente _____

Título Nombre / Posición de la persona que presuntamente le sometió a la discriminación Título VI:

Describa brevemente el incidente (utilice una hoja aparte, si es necesario):

¿ Hizo otra persona testigo del incidente? Sí () No ()

Lista de testigos (utilice una hoja aparte, si es necesario)

Nombre _____

Dirección _____

Número de Teléfono _____

Nombre _____

Dirección _____

Número de Teléfono _____

¿Ha presentado una queja sobre la supuesta discriminación con la Administración Federal de Tránsito?

Sí () No () ¿En caso afirmativo, cuándo? _____

Demandante Firma

Fecha

La denuncia deberá ser enviada a la siguiente dirección:

Cedartown Tránsito
Coordinador del Título VI
201 East Avenue
Cedartown, Georgia 30125

Cedartown Transit Title VI Complaint Procedures

If you believe that you have been excluded from participation in, been denied the benefits of, or been subjected to discrimination under the Cedartown Transit service program or activity, you may file an official Title VI complaint with the Cedartown Transit Title VI Coordinator. The following steps describe the procedures to file a complaint and how Cedartown Transit will respond.

The complaint must be submitted to the Cedartown Transit Title VI Coordinator no later than 180 days after the date of the alleged discrimination.

2. A Title VI Complaint form can be obtained by calling (770) 748-3220 or by downloading the form on our website at www.cedartowngeorgia.gov. Please provide the following information on the complaint form. You may also submit a signed written statement that contains all of the following written information.

- Your name, address, and how to contact you (phone number, email address, etc.).
- The basis of the alleged discrimination complaint (race, color, or national origin).
- How, why, when and where you believe you were excluded from participation in, were denied the benefits of, or were subjected to discrimination. If the alleged incident occurred on the transit van, give date and time of day.
- Include the location, names, and contact information of any witnesses.
- Indicate whether you have filed the complaint with the Federal Transit Administration.
- You must sign the complaint form.

If you as the complainant are unable to write a complaint, the Cedartown Transit Title VI Coordinator will assist you with the complaint. Cedartown Transit is committed to providing open access to its services to persons with limited ability to speak or understand English; if requested by complainant, the Cedartown Transit Title VI Coordinator will provide language translation services.

3. The complaint shall be sent to the following address:

Cedartown Transit Title VI Coordinator
201 East Avenue
Cedartown, Georgia 30125

4. All complaints will be investigated promptly. Reasonable measures will be undertaken to preserve any information that is confidential. The Cedartown Transit Title VI Coordinator will review every complaint, and when necessary, begin the investigation process with the assistance of the City of Cedartown Human Resources Department.

At a minimum the investigation will:

- Identify and review all relevant documents, practices and procedures;
- Identify and interview persons with knowledge of the alleged discrimination, that is, the person making the complaint; witnesses or anyone identified by the Complainant; anyone who may have been subject to similar activity, or anyone with relevant information.

5. Upon completion of the investigation, the Cedartown Transit Title VI Coordinator will complete a final report for the Cedartown City Manager. The investigation process and final report should take no longer than ninety (90) days after receipt of the complaint. If a Title VI violation is found to exist, remedial steps as appropriate and necessary will be taken immediately. The Complainant will also receive a copy of the final report together with any remedial steps.

6. If no violation is found and the complainant wishes to appeal the decision, he or she may contact the Federal Transit Administration, 230 Peachtree Street, N.W., Suite 800, Atlanta, Georgia 30303, Attention: Regional Civil Rights Officer or by calling (404) 865-5628, or web site http://www.fta.dot.gov/civilrights/title6/civil_rights_5104.html. Complainants may also file their initial Title VI complaint directly, no later than 180 days after the date of the alleged discrimination, to the Federal Transit Administration.

Cedartown Tránsito

Procedimientos de Quejas del Título VI

Si usted cree que ha sido excluida de participar en, ha negado los beneficios de, o ha sido objeto de discriminación en el marco del programa de servicio Cedartown Tránsito o actividad, puede presentar una queja oficial de Título VI con el Coordinador Cedartown Tránsito Título VI. Los siguientes pasos describen los procedimientos para presentar una queja y cómo Cedartown Tránsito responderá.

La queja debe ser presentada al Coordinador del Título VI Cedartown Tránsito no más tarde de 180 días después de la fecha de la supuesta discriminación.

2. Un formulario de queja del Título VI se puede obtener llamando al (770) 748 a 3220 o descargando el formulario en nuestro sitio web en www.cedartowngeorgia.gov. Por favor proporcione la siguiente información en el formulario de reclamación. También puede presentar una declaración escrita y firmada que contiene toda la siguiente información por escrito.

- Su nombre, dirección, y cómo contactar con usted (número de teléfono, dirección de correo electrónico, etc.).
- La base de la supuesta queja de discriminación (raza, color, o origen nacional).
- Cómo, por qué, cuándo y dónde usted cree que fue excluido de participar en, se les negó los beneficios de, o fueron objeto de discriminación. Si el supuesto incidente ocurrió en la camioneta de tránsito; la fecha y hora del día.
- Incluir la ubicación, los nombres y la información de contacto de cualquier testigo.
- Indique si usted ha presentado la denuncia ante la Administración Federal de Tránsito.
- Usted debe firmar el formulario de reclamación.

Si usted como el demandante no puede escribir una queja, el Coordinador Cedartown Tránsito Título VI le ayudará con la queja. Cedartown Tránsito se compromete a proporcionar un acceso abierto a sus servicios a las personas con capacidad limitada para hablar o entender el Inglés; si así lo solicita denunciante, el Coordinador Cedartown Tránsito Título VI proporcionará servicios de traducción de idiomas.

3. La denuncia deberá ser enviada a la siguiente dirección:

Coordinador Cedartown Tránsito Título VI
201 East Avenue
Cedartown, Georgia 30125

4. Todas las quejas serán investigadas con prontitud. Se llevarán a cabo las medidas razonables para preservar toda la información que es confidencial. El Coordinador de Cedartown Tránsito revisará cada queja.

Como mínimo la investigación hará lo siguiente:

- Identificar y revisar todos los documentos pertinentes, prácticas y procedimientos;

- Identificar y entrevistar personas con conocimiento de la presunta discriminación, es decir, la persona que hace la denuncia; testigos o cualquier persona identificada por el Reclamante; cualquier persona que pueda haber sido objeto de una actividad similar, o cualquier persona con información relevante.

5. Al término de la investigación, el Coordinador de Cedartown Tránsito completará un informe final para el Administrador de la Ciudad de Cedartown. El proceso de investigación y el informe final no deben tomar más de noventa (90) días siguientes a la recepción de la queja. Si se encuentra una violación del Título VI, se tomarán de inmediato las medidas correctivas. El demandante también recibirá una copia del informe final, junto con las medidas correctivas.

6. Si no se encuentra violación y el demandante desea apelar la decisión, él o ella puede ponerse en contacto con la Administración Federal de Tránsito, 230 Peachtree Street, NW, Suite 800, Atlanta, Georgia 30303, Atención: Oficial Regional de Derechos Civiles o llamando al (404) 865-5628, o en el sitio web http://www.fta.dot.gov/civilrights/title6/civil_rights_5104.html. Los denunciantes también puede presentar su queja inicial Título VI directamente, no más tarde de 180 días después de la fecha de la supuesta discriminación, a la Administración Federal de Tránsito.

Appendix F

Public Participation Plan (PPP)

Introduction

The Public Participation Plan (PPP) for Cedartown Transit was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the decision making process for Cedartown Transit. Policy and service delivery decisions need to take into consideration community sentiment and public opinion based upon well-executed outreach efforts. The public outreach strategies described in the PPP are designed to provide the public with effective access to information about Cedartown Transit services and to provide a variety of efficient and convenient methods for receiving and considering public comment prior to implementing changes to services. Cedartown Transit also recognizes the importance of many types of stakeholders in the decision-making process, including other units of government, metropolitan area agencies, community based organizations, major employers, passengers and the general public, including low-income, minority, LEP, and other traditionally underserved communities.

Public Participation Goals

The main goal of the PPP is to offer meaningful opportunities for all interested segments of the public, including, but not limited to, low-income, minority and LEP groups, to comment, about Cedartown Transit and its operations. The goals for this PPP include:

- **Inclusion and Diversity:** City of Cedartown Transit will proactively reach out and engage low-income, minority, and LEP populations for the Cedartown Transit service area so these groups will have an opportunity to participate.
- **Accessibility:** All legal requirements for accessibility will be met. Efforts will be made to enhance the accessibility of the public's participation – physically, geographically, temporally, linguistically and culturally.
- **Clarity and Relevance:** Issues will be framed in public meetings in such a way that the significance and potential effect of proposed decisions is understood by participants. Proposed adjustments to fares or services will be described in language that is clear and easy to understand.
- **Responsive:** Cedartown Transit will strive to respond to and incorporate, when possible, appropriate public comments into transportation decisions.
- **Tailored:** Public participation methods will be tailored to match local and cultural preferences as much as possible.
- **Flexible:** The public participation process will accommodate participation in a variety of ways and will be adjusted over time as needed.

Public Participation Methods

The methods of public participation included in this PPP were developed based upon best practices in conjunction with the needs and capabilities of Cedartown Transit. Cedartown Transit intends to achieve meaningful public participation by a variety of methods with respect to service and any changes to service.

The public will be invited to provide feedback on the City of Cedartown website (www.cedartowngeorgia.gov) and all feedback on the site will be recorded and passed on to City of Cedartown Transit management. The public will also be able to call the Cedartown Transit office at 770-748-4074 during its hours of operation. Feedback collected over the phone will be recorded and passed on to Cedartown Transit management. Formal customer surveys to measure performance, and listening sessions to solicit input, will be conducted periodically. The comments recorded as a part of these participation methods will be responded to as appropriate.

Meeting formats will be tailored to help achieve specific public participation goals that vary by project or the nature of the proposed adjustment of service. Some meetings will be designed to share information and answer questions. Some will be designed to engage the public in providing input, establishing priorities, and helping to achieve consensus on a specific recommendation. Others will be conducted to solicit and consider public comments before implementing proposed adjustments to services. In each case, an agenda for the meetings will be created that work to achieve the stated goals and is relevant to the subject and not overwhelming for the public.

For all public meetings, the venue will be a facility that is accessible for persons with disabilities and, preferably, is served by public transit. If a series of meetings are scheduled on a topic, different meeting locations may be used, since no one location is usually convenient to all participants.

City of Cedartown Transit will use a variety of means to make riders and citizens aware, including some or all of the following methods:

- In-vehicle advertisement
- Posters or flyers in transit center
- Posting information on website
- Press releases and briefings to media outlets
- Multilingual flyer distribution to community based organizations, particularly those that target LEP population. Specific examples of this include partnerships with public schools in the City of Cedartown. Schools have received Spanish brochures and flyers for distribution to LEP students who in turn communicate with parents.
- Flyers and information distribution through various libraries and other civic locations that currently help distribute timetables and other information
- Communications to relevant elected officials
- Other methods required by local or state laws or agreements

All information and materials communicating proposed and actual service adjustments will be provided in English and any other language that meets the “safe harbor” criteria, which in the case of the Cedartown Transit system is Spanish.

Public Hearing

FTA requires public hearings for any major service changes such as fare increases or service area changes over 25% to ensure minority populations are not adversely affected. Our agency has not been required to perform public hearings related to transit services as fare rates and the service area has stayed consistent..

Appendix G

Language Assistance Plan (LAP)

I. Introduction

City of Cedartown Transit operates a transit system within the City of Cedartown. The Language Assistance Plan (LAP) has been prepared to address Cedartown Transit's responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP. In the City of Cedartown Transit service area there are 1,967 residents or 22.1% who describe themselves as not able to communicate in English "very well" (Source: US Census). Cedartown Transit is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. City of Cedartown Transit has utilized the U.S. Department of Transportation (USDOT) LEP Guidance Handbook and performed a four factor analysis to develop its LAP.

The U.S. Department of Transportation Handbook, titled "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers, (April 13, 2007) " (hereinafter "Handbook"), states that Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance (Handbook, page 5). The Handbook further adds that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination (Handbook, page 5).

Executive Order 13166 of August 16, 2000 states that recipients of Federal financial assistance must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons (Handbook, page 6). Additionally recipients should use the DOT LEP Guidance to determine how best to comply with statutory and regulatory obligations to provide meaningful access to the benefits, services, information and other important portions of their programs and activities for individuals who are LEP (Handbook, page 6). These provisions are included in FTA Circular 4702.1B in Paragraph 9 of Chapter III (pages III-6 to III-9).

For many LEP individuals, public transit is the principal transportation mode available. It is important for the City of Cedartown Transit to be able to communicate effectively with all of its riders. When Cedartown Transit is able to communicate effectively with all of its riders, the service provided is safer, more reliable, convenient, and accessible for all within its service area. Cedartown Transit is committed to taking reasonable steps to ensure meaningful access for LEP individuals to this agency's services in accordance with Title VI.

This plan will demonstrate the efforts that Cedartown Transit undertakes to make its service accessible to all persons without regard to their ability to communicate in English. The plan addresses how services will be provided through general guidelines and procedures including the following:

- Identification: Identifying LEP populations in service areas

- Notification: Providing notice to LEP individuals about their right to language services
- Interpretation: Offering timely interpretation to LEP individuals upon request
- Translation: Providing timely translation of important documents
- Staffing: Identifying City of Cedartown Transit staff to assist LEP customers
- Training: Providing training on LAP to responsible employees.

II. Four Factor Analysis

The analysis provided in this report has been developed to identify LEP population that may use Cedartown Transit services and identify needs for language assistance. This analysis is based on the “Four Factor Analysis” presented in the Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons, dated April 13, 2007, which considers the following factors:

1. The number and proportion of LEP persons in the service area who may be served or are likely to encounter a Cedartown Transit program, activity or service.
2. The frequency with which LEP persons come in contact with Cedartown Transit programs, activities or services.
3. The nature and importance of programs, activities or services provided by Cedartown Transit to the LEP population.
4. The resources available to Cedartown Transit and overall costs to provide LEP assistance

a. Factor 1: The Number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population

Of the 8,903 residents in the Cedartown Transit service area 1,967 residents describe themselves as speaking English less than “very well”. People of Hispanic descent are the primary LEP persons likely to utilize City of Cedartown Transit services. For the Cedartown Transit service area, the American Community Survey of the U.S. Census Bureau shows that among the area’s population 77% speak English “very well”. For groups who speak English “less than very well”, 22% speak Spanish and .19% speak Hindi .

b. Factor 2: The Frequency with which LEP Individuals Come into Contact with Your Programs, Activities, and Services

The Federal guidance for this factor recommends that agencies should assess the frequency with which they have contact with LEP individuals from different language groups. The more frequent the contact with a particular LEP language group, the more likely enhanced services will be needed.

Cedartown Transit has assessed the frequency with which LEP individuals come in contact with the transit system. The methods utilized for this assessment include analysis of Census data, examining phone inquiries, requests for translated documents, and staff survey. As discussed above, Census data indicates that a prominent LEP group of Hispanics may require assistance. Phone inquiries and staff survey feedback have indicated, though, that Cedartown Transit dispatchers and drivers interact infrequently with LEP persons. The majority of these interactions have occurred with LEP persons who mainly spoke Spanish. Over the past 3 years, Cedartown Transit has had 1 request for translated documents.

c. **Factor 3: The Nature and Importance of the Program, Activity, or Service Provided by the Recipient to People's Lives**

Public transportation and regional transportation planning is vital to many people's lives. According to the Department of Transportation's *Policy Guidance Concerning Recipient's Responsibilities to LEP Persons*, providing public transportation access to LEP persons is crucial. A LEP person's inability to utilize public transportation effectively, may adversely affect his or her ability to access health care, education, or employment.

Future on-board passenger surveys will be conducted to collect data on usage of and access to the Cedartown Transit's services.

Factor 4: The Resources Available to the Recipient and Costs

Cedartown Transit assessed its available resources that are currently being used, and those that could be used, to provide assistance to LEP populations. These resources include the following: bilingual City staff that can assist in situations where LEP populations need assistance. City of Cedartown Transit provides a reasonable degree of services for LEP populations in its service area. LEP populations have the ability to call city offices and reach bilingual staff. Through bilingual staff, LEP populations (specifically Spanish speaking) can ask questions about the transit program. Translation services are also available in case of unavailability of bilingual staff. Pertinent transit documents have also been translated to the Spanish language. As staff are already on payroll for other general duties, there are no extra costs associated with providing assistance to LEP populations.

III. Language Assistance Plan

In developing a Language Assistance Plan, FTA guidance recommends the analysis of the following five elements:

1. Identifying LEP individuals who need language assistance
2. Providing language assistance measures

3. Training staff
4. Providing notice to LEP persons
5. Monitoring and updating the plan

The five elements are addressed below.

a. Element 1: Identifying LEP Individuals Who Need Language Assistance

Federal guidance provides that there should be an assessment of the number or proportion of LEP individuals eligible to be serviced or encountered and the frequency of encounters pursuant to the first two factors in the four-factor analysis.

City of Cedartown Transit has identified the number and proportion of LEP individuals within its service area using United States Census data (see Appendix H). As presented earlier, 64% of the service area population speaks English only. The largest non-English spoken language in the service area is Spanish (36%). Of those whose primary spoken language is Spanish, approximately 22% identify themselves as speaking less than “very well”. Those residents whose primary language is not English or Spanish and who identify themselves as speaking English less than “very well” account for .44% of the service area population.

City of Cedartown Transit may identify language assistance need for an LEP group by:

1. Examining records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events or meetings.
2. Having Census Bureau Language Identification Flashcards on all transit vehicles to assist operators in identifying specific language assistance needs of passengers. If such individuals are encountered, vehicle operators will be instructed to obtain contact information to give to City of Cedartown Transit management to follow-up.
3. Vehicle operators and front-line staff (i.e. Dispatchers, Transit Operation Supervisors, etc.) will be surveyed on their experience concerning any contacts with LEP persons during the previous year.

b. Element 2: Language Assistance Measures

Federal Guidance suggests that an effective LAP should include information about the ways in which language assistance will be provided. This refers to listing the different language services an agency provides and how staff can access this information.

For this task Federal Guidance recommends that transit agencies consider developing strategies that train staff as to how to effectively deal with LEP individuals when they either call agency centers or otherwise interact with the agency.

City of Cedartown Transit has undertaken the following actions to improve access to information and services for LEP individuals:

1. Provide bilingual staff at community events.
2. Survey transit drivers and other front-line staff annually on their experience concerning any contacts with LEP persons during the previous year.
3. Provide Language Identification Flashcards onboard transit vehicles and in the City of Cedartown Transit offices.
4. Include statements clarifying that being bilingual is preferred on bus driver recruitment flyers and onboard recruitment posters.
5. When an interpreter is needed in person or on the telephone, staff will attempt to access language assistance services from a professional translation service, City staff members or qualified community volunteers.

c. Element 3: Training Staff

Federal guidance states staff members of an agency should know their obligations to provide meaningful access to information and services for LEP persons and that all employees in public contact positions should be properly trained.

Suggestions for implementing Element 3 of the Language Assistance Plan, involve: (1) identifying agency staff likely to come into contact with LEP individuals; (2) identifying existing staff training opportunities; (3) providing regular re-training for staff dealing with LEP individual needs; and (4) designing and implementing LEP training for agency staff.

In the case of City of Cedartown Transit, the most important staff training is for Customer Service Representatives and transit drivers. There are City employees who are bilingual in English and [other language].

The following training will be provided to Customer Service Representative:

1. Information on Title VI Procedures and LEP responsibilities
2. Use of Language Identification Flashcards
3. Documentation of language assistance requests
4. How to handle a potential Title VI/LEP complaint

d. Element 4: Providing Note to LEP Persons

City of Cedartown Transit will make Title VI information available in English and Spanish on the Agency's website. Key documents are written in English and Spanish. Notices are also posted in City Hall's lobby office lobby, on buses, and the Transit department office. Additionally, when staff prepares a document or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

e. Element 5: Monitoring and Updating the Plan

The plan will be reviewed and updated on an ongoing basis. Updates will consider the following:

- The number of documented LEP person contacts encountered annually
- How the needs of LEP persons have been addressed
- Determination of the current LEP population in the service area
- Determination as to whether the need for translation services has changed
- Determine whether City of Cedartown Transit's financial resources are sufficient to fund language assistance resources needed

City of Cedartown Transit understands the value that its service plays in the lives of individuals who rely on this service, and the importance of any measures undertaken to make the use of system easier. City of Cedartown Transit is open to suggestions from all sources, including customers, City of Cedartown Transit staff, other transportation agencies with similar experiences with LEP communities, and the general public, regarding additional methods to improve their accessibility to LEP communities.

IV. Safe Harbor Provision

DOT has adopted the Department of Justice's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP population. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

The City of Cedartown Transit service area does have LEP populations which qualify for the Safe Harbor Provision. [As shown in Appendix H, 1,943 speakers qualify for the Safe Harbor Provision as the number of person which speak English less than “very well” is counted as 22% and 1,943 persons.]

The Safe Harbor Provision applies to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. The City of Cedartown Transit System may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures.

CITY OF CEDARTOWN, GEORGIA

Policy to Make Services Accessible to Limited English Proficient Persons

As a recipient of federal funds, the City of Cedartown, Georgia is subject to the following federal non-discrimination laws:

- Title VI of the Civil Rights Act of 1964
- Title VII of the Civil Rights Act of 1964

Title VI prohibits discrimination in service provision based on race, color, disability, sex, national origin, age and/or religion. Title VII prohibits discrimination in employment based on race, color, disability, sex, national origin, age and/or religion. In compliance with these non-discrimination laws, and with the Americans with Disabilities Act, the City of Cedartown sets forth the following policy to provide services to Limited English Proficient, deaf, or hard of hearing persons:

- The City of Cedartown will maintain an updated list of bilingual staff available to those seeking services. Staff will have access to this list to respond to any incoming calls. The list will include the language proficiencies of staff members.
- If a person needs interpretation services over the phone in a language in which no staff, volunteers, or interns are proficient, the City of Cedartown will contact the AT&T language line at 800.752.6096 after courteously asking the caller to hold. A staff representative will be provided with the credit card information and procedures for obtaining the language line's services in the event a Limited English Proficient person calls.
- If a person is deaf or hard of hearing, the City of Cedartown will utilize a sign language chart to assist the deaf person.
- The City of Cedartown will publicize on its website that the City does not discriminate based on Limited English Proficiency and that services are available regardless of language ability.

Filing a Complaint

A person who believes s/he has been harassed or been subject to discriminatory treatment with the City of Cedartown because of race, color, national origin, sex, age, religion, or disability, or has been retaliated against for engaging in protected activity, is urged to file a complaint through the Cedartown Title VI & VII Coordinator. Formal complaints must be filed within 180 calendar days of the alleged act of discrimination. The complaint may be filed in a letter, in an email, in person, or over the phone. In anticipation of filing a complaint, an individual may find it beneficial to contact the Title VI & VII Coordinator to obtain policy clarification, advice, or assistance.

**CEDARTOWN TRÁNSITO
CEDARTOWN, GEORGIA**

La Política para Hacer Que Estos Servicios Sean Accesibles para Personas Con Dominio Limitado del Inglés

Como beneficiario de los fondos federales, Cedartown Tránsito está sujeta a las siguientes leyes federales contra la discriminación:

- Título VI del Acta de Derechos Civiles de 1964
- Título VII del Acta de Derechos Civiles de 1964

Título VI prohíbe la discriminación en programas y actividades que reciben asistencia financiera Federal. El Título VII prohíbe la discriminación en el empleo. En el cumplimiento de estas leyes contra la discriminación, y con El Acta para los Norteamericanos con Discapacidades, Cedartown Tránsito establece la siguiente política para proporcionar servicios a Dominio Limitado del Inglés, sordo, o con problemas de audición de las personas:

- Cedartown Tránsito mantendrá una lista actualizada de personal bilingüe disponible para aquellos que buscan servicios. El personal tendrá acceso a esta lista para responder a cualquier llamada entrante. La lista incluirá las competencias lingüísticas de los miembros del personal.
- Si una persona necesita servicios de interpretación por teléfono en un idioma en el que no hay personal o voluntarios, Cedartown Tránsito pondrá en contacto con la línea de idiomas de AT&T al 800.752.6096 después de pedir cortésmente la persona que llama a celebrar. Un representante del personal será proporcionado con la información tarjeta de credito y los procedimientos para la obtención de los servicios de la línea de la lengua en el caso de que una persona con Dominio Limitado del Inglés llama.
- Si una persona es sordo o tiene problemas auditivos, los empleados Cedartown Tránsito se utilizan una tabla de lenguaje de señas para ayudar a la persona sorda.
- El Cedartown Tránsito dará a conocer en su sitio web que no discriminamos basado en Dominio Limitado del Inglés y que los servicios están disponibles, independientemente de la capacidad lingüística.

Cómo Presentar Una Queja

Una persona que cree que han sido acosados o han sido objeto de un trato discriminatorio con Cedartown Tránsito por motivos de raza, color, origen nacional, sexo, edad, religión o discapacidad, o ha sido víctima de represalias por participar en una actividad protegida, se insta a presentar una queja a través de la Coordinadora Cedartown Título VI y VII. Las quejas formales deben ser presentadas dentro de los 180 días naturales siguientes a la presunto acto de discriminación. La queja puede ser presentada en una carta, en un correo electrónico, en persona o por teléfono. A la espera de la presentación de una queja, una persona puede encontrar beneficioso a ponerse en contacto con el Coordinador del Título VI y VII para obtener clarificación política, asesoramiento, o asistencia.

☐

ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.

1. Arabic

☐

Խորհրդով եմք հշով կատարեք այս քառակուսով,
եթե խոսում կամ կարդում եք հայերեն:

2. Armenian

☐

যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন।

3. Bengali

☐

ឈ្មួចញាក់ក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។

4. Cambodian

☐

Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.

5. Chamorro

☐

如果你能读中文或讲中文，请选择此框。

6. Simplified Chinese

☐

如果你能讀中文或講中文，請選擇此框。

7. Traditional Chinese

☐

Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.

8. Croatian

☐

Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.

9. Czech

☐

Kruis dit vakje aan als u Nederlands kunt lezen of spreken.

10. Dutch

☐

Mark this box if you read or speak English.

11. English

☐

اگر خواندن و نوشتن فارسی بلد هستید، این مربع را علامت بزنید.

12. Farsi

<input type="checkbox"/>	Cocher ici si vous lisez ou parlez le français.	13. French
<input type="checkbox"/>	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.	14. German
<input type="checkbox"/>	Σημειώστε αυτό το πλαίσιο αν διαβάσετε ή μιλάτε Ελληνικά.	15. Greek
<input type="checkbox"/>	Make kazyè sa a si ou li oswa ou pale kreyòl ayisyen.	16. Haitian Creole
<input type="checkbox"/>	अगर आप हिन्दी बोलते या पढ़ सकते हैं तो इस बक्स पर चिह्न लगाएँ।	17. Hindi
<input type="checkbox"/>	Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	18. Hmong
<input type="checkbox"/>	Jelölje meg ezt a kockát, ha megérti vagy beszél a magyar nyelvet.	19. Hungarian
<input type="checkbox"/>	Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano.	20. Ilocano
<input type="checkbox"/>	Marchi questa casella se legge o parla italiano.	21. Italian
<input type="checkbox"/>	日本語を読んだり、話せる場合はここに印を付けてください。	22. Japanese
<input type="checkbox"/>	한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.	23. Korean
<input type="checkbox"/>	ໃຫ້ໝາຍໃສ່ຂໍ້ມູນນີ້ ຖ້າທ່ານອ່ານຫຼືປາກພາສາລາວ.	24. Laotian
<input type="checkbox"/>	Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	25. Polish

<input type="checkbox"/>	Assinale este quadrado se você lê ou fala português.	26. Portuguese
<input type="checkbox"/>	Însemnați această căsuță dacă citiți sau vorbiți românește.	27. Romanian
<input type="checkbox"/>	Пометьте этот квадратик, если вы читаете или говорите по-русски.	28. Russian
<input type="checkbox"/>	Обележите овај квадратик уколико читате или говорите српски језик.	29. Serbian
<input type="checkbox"/>	Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky.	30. Slovak
<input type="checkbox"/>	Marque esta casilla si lee o habla español.	31. Spanish
<input type="checkbox"/>	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	32. Tagalog
<input type="checkbox"/>	ให้กาเครื่องหมายลงในช่องถ้าท่านอ่านหรือพูดภาษาไทย.	33. Thai
<input type="checkbox"/>	Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga.	34. Tongan
<input type="checkbox"/>	Відмітьте цю клітинку, якщо ви читаете або говорите українською мовою.	35. Ukranian
<input type="checkbox"/>	اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگائیں۔	36. Urdu
<input type="checkbox"/>	Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ.	37. Vietnamese
<input type="checkbox"/>	באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש.	38. Yiddish

Appendix H

Operating Area Language Data:

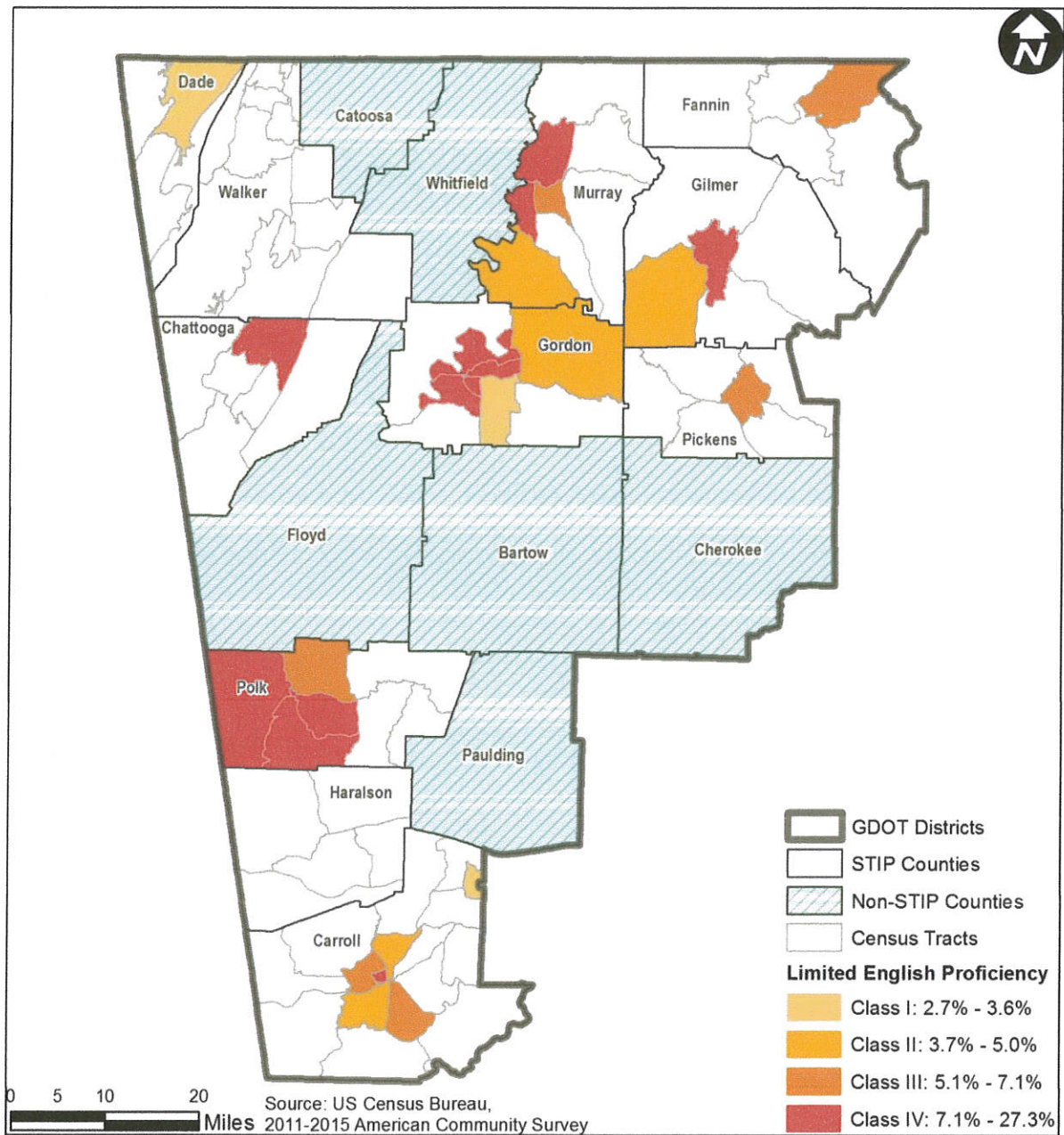
City of Cedartown Transit Service Area

<u>Language</u>	<u>City</u>	<u>Percent of Population</u>
Total	8,903	100
Speak only English	5,667	64
Spanish or Spanish Creole	3,149	36
Speak English "very well"	1,206	14
Speak English less than "very well"	1,943	22
French (incl. Patois, Cajun)	15	.17
Speak English "very well"	15	.17
Speak English less than "very well"		
French Creole		
Speak English "very well"		
Speak English less than "very well"		
Italian		
Speak English "very well"		
Speak English less than "very well"		
Portuguese or Portuguese Creole		
Speak English "very well"		
Speak English less than "very well"		
German		
Speak English "very well"		
Speak English less than "very well"		
Yiddish		
Speak English "very well"		
Speak English less than "very well"		
Other West Germanic languages		
Speak English "very well"		
Speak English less than "very well"		
Scandinavian languages		
Speak English "very well"		
Speak English less than "very well"		
Greek		
Speak English "very well"		
Speak English less than "very well"		
Russian		
Speak English "very well"		
Speak English less than "very well"		
Polish		
Speak English "very well"		
Speak English less than "very well"		
Serbo-Croatian		
Speak English "very well"		

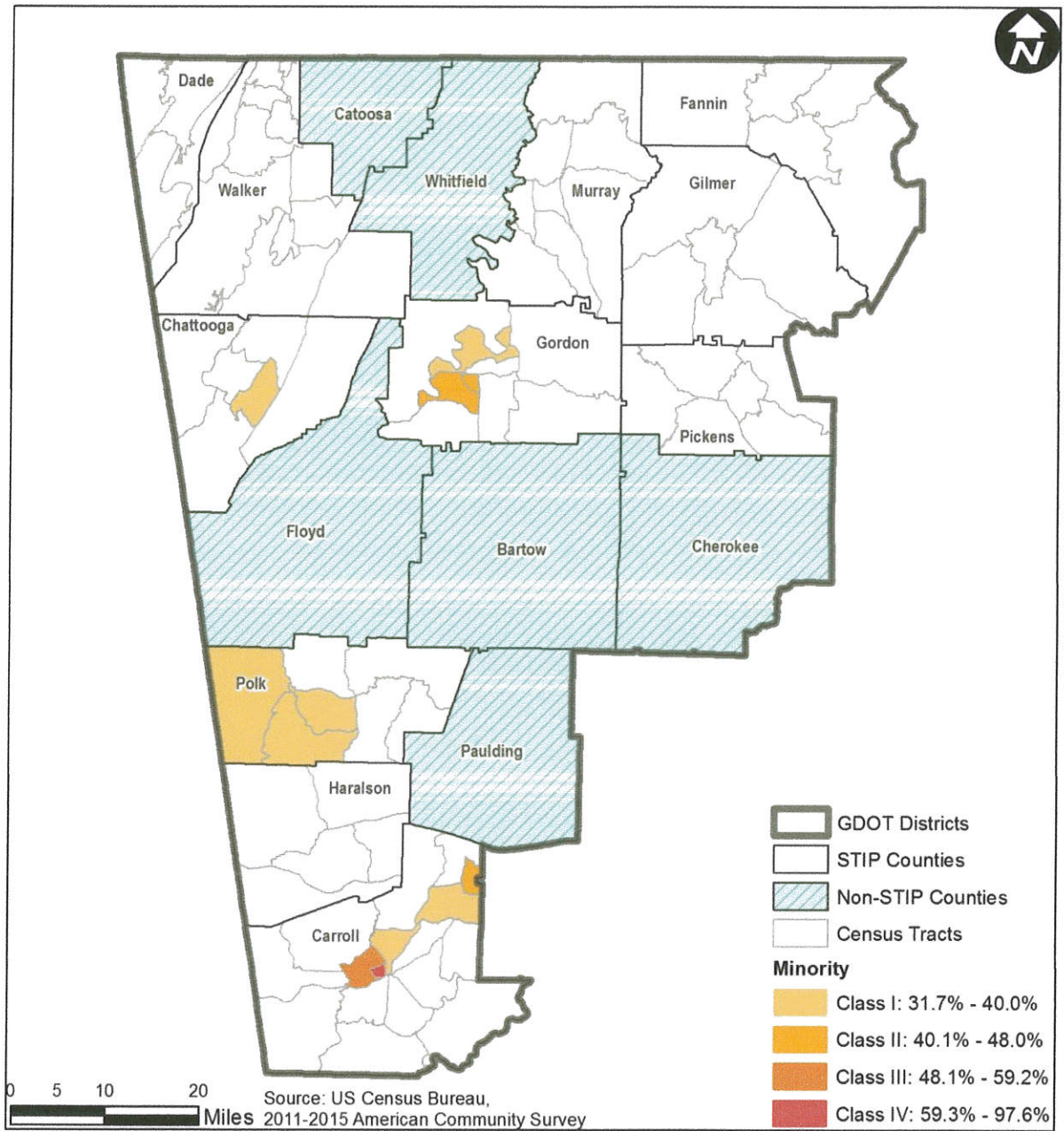
<u>Language</u>	<u>City</u>	<u>Percent of Population</u>
Speak English less than "very well"		
Other Slavic Languages		
Speak English "very well"		
Speak English less than "very well"		
Armenian		
Speak English "very well"		
Speak English less than "very well"		
Persian		
Speak English "very well"		
Speak English less than "very well"		
Gujarati	48	.54
Speak English "very well"	48	.54
Speak English less than "very well"		
Hindi	17	.19
Speak English "very well"		
Speak English less than "very well"	17	.19
Urdu		
Speak English "very well"		
Speak English less than "very well"		
Other Indic languages		
Speak English "very well"		
Speak English less than "very well"		
Other Indo-European Languages		
Speak English "very well"		
Speak English less than "very well"		
Chinese		
Speak English "very well"		
Speak English less than "very well"		
Japanese		
Speak English "very well"		
Speak English less than "very well"		
Korean		
Speak English "very well"		
Speak English less than "very well"		
Mon-Khmer, Cambodian		
Speak English "very well"		
Speak English less than "very well"		
Hmong		
Speak English "very well"		
Speak English less than "very well"		
Thai		

<u>Language</u>	<u>City</u>	<u>Percent of Population</u>
Speak English "very well"		
Speak English less than "very well"		
Laotian		
Speak English "very well"		
Speak English less than "very well"		
Vietnamese		
Speak English "very well"		
Speak English less than "very well"		
Other Asian languages		
Speak English "very well"		
Speak English less than "very well"		
Tagalog		
Speak English "very well"		
Speak English less than "very well"		
Other Pacific Island languages		
Speak English "very well"		
Speak English less than "very well"		
Navajo		
Speak English "very well"		
Speak English less than "very well"		
Other Native American languages		
Speak English "very well"		
Speak English less than "very well"		
Hungarian		
Speak English "very well"		
Speak English less than "very well"		
Arabic		
Speak English "very well"		
Speak English less than "very well"		
Hebrew		
Speak English "very well"		
Speak English less than "very well"		
African languages		
Speak English "very well"		
Speak English less than "very well"		
Other and unspecified languages	7	.08
Speak English "very well"		
Speak English less than "very well"	7	.08

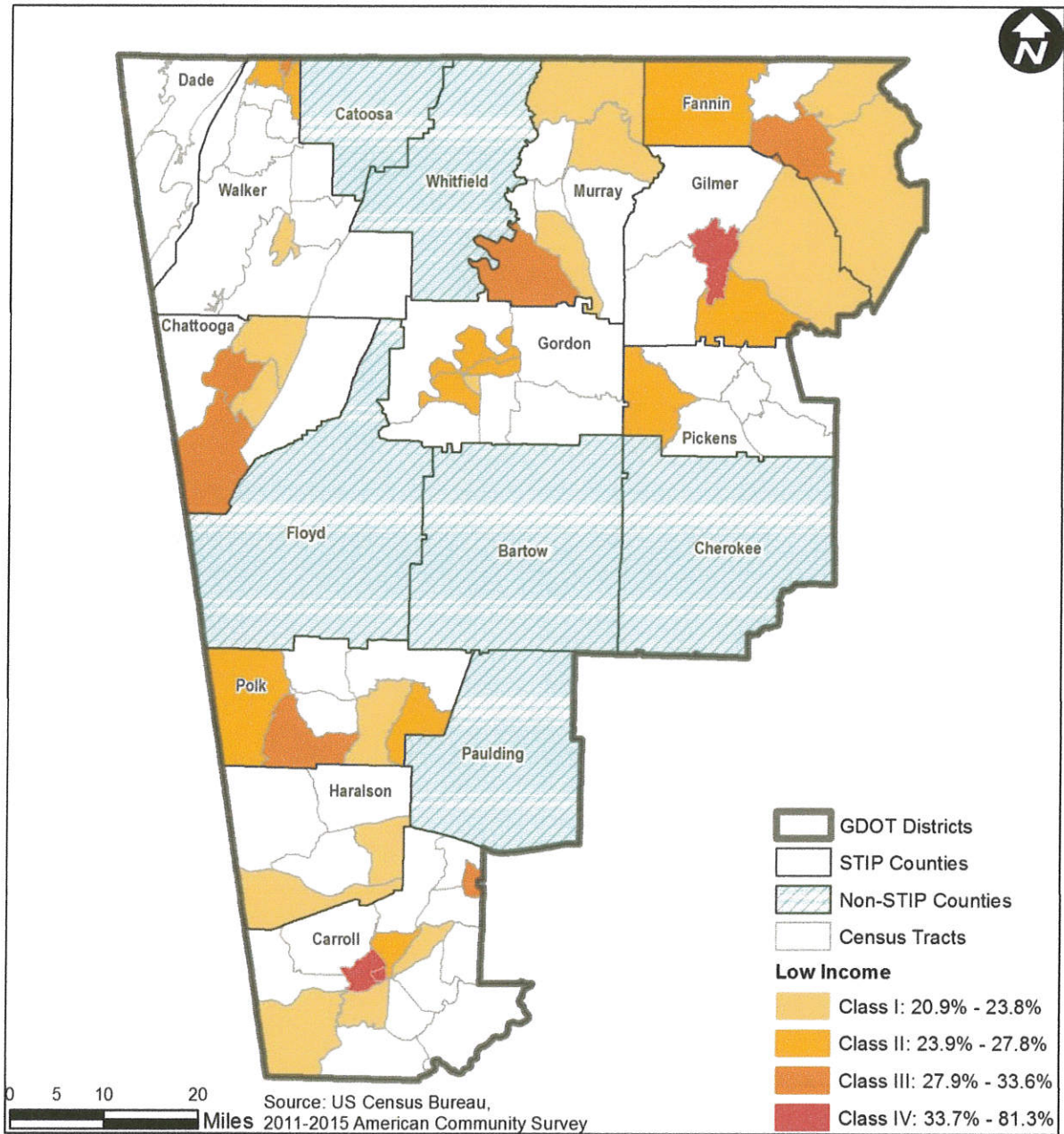
Limited English Proficiency in Region 6:



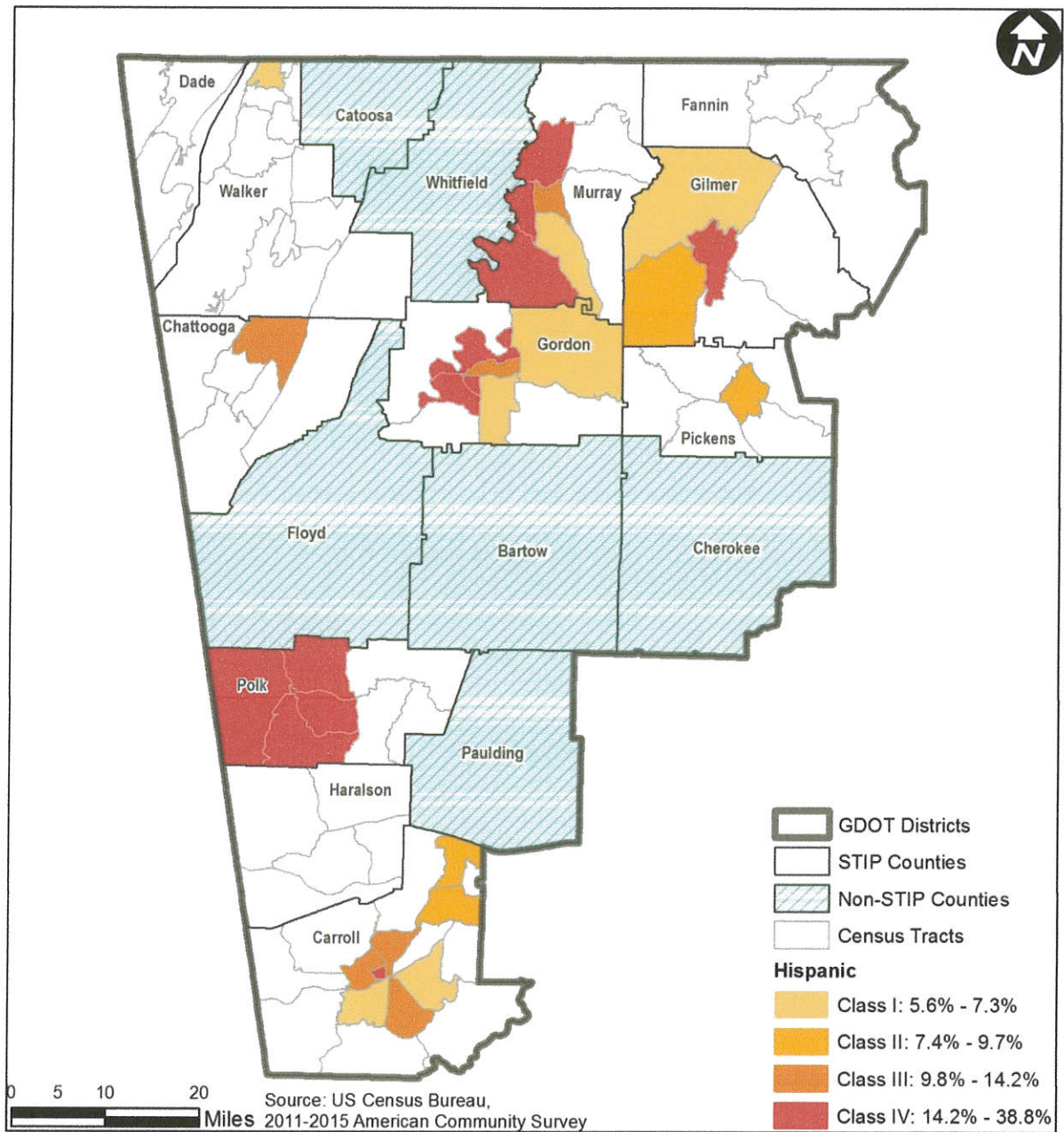
Minority Population in Region 6:



Low-income Population in Region 6:



Hispanic Population in Region 6:



Appendix I

Demographic Maps

Appendix J

Title VI Equity Analysis

City of Cedartown Transit System has not performed Title VI Equity Analysis.

Appendix K

Text Formatting Palette

Formatting/Styles

Report margins:

Top margin = 1"

Bottom margin = 1"

Left margin = 1.25"

Right margin = .75"

Heading levels:

Heading One

Calibri 14 pt bold; left-aligned; paragraph spacing = 10 pt after; line spacing multiple 1.15

Heading 2

Calibri 13 pt bold; left-aligned; line spacing-multiple 1.15; paragraph spacing = 10 pt after

Body Text: Calibri 11; fully-justified text; line spacing-multiple 1.15; 10 pt. after.

- Bulleted List: Calibri 10 pt; line spacing-multiple 1.15; paragraph spacing = 10 pt after

General Instructions

How to Update Table of Contents:

Right click on table of contents and choose **update field**—you will then have the option of updating the entire table of contents or just the page numbers.

How to Add New Section:

Under **Page Layout Menu**, choose **Breaks**, then **Section Break**, then **Next Page**. Heading numbers should update automatically in new section.

1.0 Title VI/Nondiscrimination Policy Statement and Management Commitment to Title VI Plan

49 CFR Part 21.7(a): Every application for Federal financial assistance to which this part applies shall contain, or be accompanied by, an assurance that the program will be conducted or the facility operated in compliance with all requirements imposed or pursuant to [49 CFR Part 21].

CITY OF CEDARTOWN TRANSIT assures the Georgia Department of Transportation that no person shall on the basis of race, color, national origin, age, disability, family or religious status, as provided by Title VI of the Civil Rights Act of 1964, Federal Transit Laws, 49 CFR Part 21 Unlawful Discrimination, Nondiscrimination In Federally-Assisted Programs Of The Department Of Transportation and as per written guidance under FTA Circular 4702.1B, dated October 2012, be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination or retaliation under any program or activity undertaken by the agency.

CITY OF CEDARTOWN TRANSIT further agrees to the following responsibilities with respect to its programs and activities:

1. Designate a Title VI Liaison that has a responsible position within the organization and access to the recipient's Chief Executive Officer or authorized representative.
2. Issue a policy statement signed by the Executive Director or authorized representative, which expresses its commitment to the nondiscrimination provisions of Title VI. The policy statement shall be circulated throughout the Recipient's organization and to the general public. Such information shall be published where appropriate in language other than English.
3. Insert the clauses of Section 4.5 of this plan into every contract subject to the Acts and the Regulations.
4. Develop a complaint process and attempt to resolve complaints of discrimination against CITY OF CEDARTOWN TRANSIT.
5. Participate in training offered on the Title VI and other nondiscrimination requirements.
6. If reviewed by GDOT or any other state or federal regulatory agency, take affirmative actions to correct any deficiencies found within a reasonable time period, not to exceed ninety (90) days.
7. Have a process to collect racial and ethnic data on persons impacted by the agency's programs.
8. Submit the information required by FTA Circular 4702.1B to the GDOT. (refer to Appendix A of this plan)

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all federal funds, grants, loans, contracts, properties, discounts or other federal financial assistance under all programs and activities and is binding. The person whose signature appears below is authorized to sign this assurance on behalf of the agency.

Signature: 

Printed Name: Matt Foster

Chairman, Cedartown City Commission, City of Cedartown Transit, Date: 09/09/2019

2.0 Introduction & Description of Services

This is a section of the plan which covers general information about the transit agency.

CITY OF CEDARTOWN TRANSIT submits this Title VI Plan in compliance with Title VI of the Civil Rights Act of 1964, 49 CFR Part 21, and the guidelines of FTA Circular 4702.1B, published October 1, 2012.

CITY OF CEDARTOWN TRANSIT is a sub-recipient of FTA funds and provides service in the City of Cedartown, Georgia. A description of the current City of Cedartown Transit system is included in Appendix B.

Title VI Liaison

Mitzi Allen – City Clerk
City of Cedartown
770-748-3220
201 East Avenue

Alternate Title VI Contact

Edward Guzman – Assistant City Manager
City of Cedartown
770-748-3220
201 East Avenue

CITY OF CEDARTOWN TRANSIT must designate a liaison for Title VI issues and complaints within the organization. The liaison is the focal point for Title VI implementation and monitoring of activities receiving federal financial assistance. Key responsibilities of the Title VI Liaison include:

- Maintain knowledge of Title VI requirements.
- Attend training on Title VI and other nondiscrimination authorities when offered by GDOT or any other regulatory agency.
- Disseminate Title VI information to the public including in languages other than English, when necessary.
- Develop a process to collect data related to race, gender and national origin of service area population to ensure low income, minorities, and other underserved groups are included and not discriminated against.
- Implement procedures for the prompt processing of Title VI complaints.